

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA  
SAVANNAH DIVISION

UNITD STATES OF AMERICA

v.

RAPHAEL SAMUEL SMITH

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CASE NO. 4:21-CR-111

**GOVERNMENT'S MOTION TO SEAL EXHIBITS A, B, C, D, AND E**

The United States of America, by and through David H. Estes, United States Attorney for the Southern District of Georgia, and the undersigned Assistant United States Attorney, files this Motion to Seal Exhibits A, B, C, D and E. The Government has prepared and is filing its Response in Opposition to Defendant's Motions to Suppress (Doc. 371). In this Response, the Government has attached Exhibits A, B, C, D and E, which contain statistical analyses of Title III wiretap interceptions and law enforcement sensitive documents relating to specific minimization procedures.

The Government submits that the reasons included *supra* are sufficient to support its request to seal pursuant to S.D. Ga. L. Civ. R. 79.7(b), which states, "[A]ny person desiring to have any matter placed under seal shall present a motion setting forth the grounds why the matter presented should not be available for public inspection."

THEREFORE, the Government respectfully requests that Exhibits A, B, C, D and E, which are attached to Government's Response in Opposition to Defendant's Motion to Suppress remain under seal until further order of this Court.

Respectfully submitted,

DAVID H. ESTES  
UNITED STATES ATTORNEY

***/s/ Noah J. Abrams***  
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**CERTIFICATE OF SERVICE OF GOVERNMENT'S MOTION TO SEAL EXHIBITS A, B, C,  
D, AND E**

This is to certify that I have on this day served the attorney(s) of record in this case in accordance with the notice of electronic filing ("NEF") which was generated as a result of electronic filing in this Court.

Submitted this 1st day of April 2022.

DAVID H. ESTES  
UNITED STATES ATTORNEY

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